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August 24, 2005

PEDEWED

AUG 2, 5 2005

Hon. Elizabeth O'Donnell Executive Director Public Service Commission of Kentucky 211 Sower Boulevard Frankfort, KY 40601

Application of Blue Grass Energy Cooperative Corporation for an

Adjustment of Rates Case No.: 2005-00330

Dear Ms. O'Donnell:

Enclosed please find the original and 11 copies of the Kentucky Cable Telecommunications Association's Motion to Intervene in the abovereferenced proceeding. Please file stamp one of the 11 copies and return it to me in the enclosed self-addressed stamped envelope.

Thank you for your attention to this matter and please let me know if there are any questions.

Very truly yours,

WYATT, TARRANT & COMBS, LLP

Frank F. Chuppe

FFC/pw Enclosures

Gardner Gillespie

20230717.4

918 State Street

615.244.0020

1715 Aaron Brenner Drive, Suite 800

COMMONWEALTH OF KENTUCKY BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION



AUG 2 5 2005

In the Matter of:

COMMISSION PUBLIC SHIP.

APPLICATION OF BLUE GRASS)
ENERGY COOPERATIVE CORPORATION)
FOR AN ADJUSTMENT OF RATES)

CASE NO. 2005-00330

KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION'S MOTION TO INTERVENE

The Kentucky Cable Telecommunications Association ("KCTA") moves to intervene in the above-referenced proceeding pursuant to 807 KAR 5:001, § 3 and 5:001, § 10. KCTA is a non-profit organization consisting of more than one hundred cable television systems serving the majority of cable television customers throughout Kentucky. KCTA members are directly affected by that portion of Blue Grass Energy Cooperative's ("Blue Grass") Application for an Adjustment that seeks to increase its pole attachment rates because they are attached to Blue Grass' utility poles.

KCTA's intervention is in lieu of the individual intervention of its affected members. Consequently, KCTA's invention will promote the efficient progress of this proceeding. Further, KCTA seeks full intervention pursuant to 807 KAR 5:001, § 3(a) to allow it to fully participate as a party and to be served with documents related to Blue Grass' Application.

This Commission has regulated pole attachment rates since 1982. In that time KCTA has regularly represented its members in virtually every pole attachment rate case that has arisen before the Commission. KCTA seeks intervention in this proceeding in lieu of the intervention of its three members named above. Allowing the KCTA's intervention would allow the interests of its members to be represented without the burden of each being required to retain

its own counsel and make its own filings; for the same reasons allowing KCTA's intervention on their behalf will reduce the burden on the other parties and the Commission as well.

KCTA pledges to adhere to all Commission rules and procedures applicable to it as a party intervenor in this proceeding.

WHEREFORE, KCTA moves for full intervention in the above-referenced proceeding.

Respectfully submitted,

Gardner F. Gillespie HOGAN & HARSTON, L.L.P. 555 Thirteenth Street Washington, DC 20004-1109

Frank F. Chuppe

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(502) 562-7336

CERTIFICATE OF SERVICE

The undersigned hereby certifies that an original and ten photocopies of the foregoing were served by U.S. Mail, postage prepaid, upon Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, KY 40601; and a copy of the foregoing was served upon J. Donald Smothers, Vice-President, Blue Grass Energy Cooperative Corporation, P.O. Box 990, 1201 Lexington Road, Nicholasville, KY 40340, and Dennis G. Howard II and Elizabeth E. Blackford, Assistant Attorneys General, 1024 Capital Center Drive, Suite 200, Frankfort, KY 40601-8204 by U.S. Mail, postage prepaid, this 24 day of August, 2005.

Frank/F./Chuppe

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